IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF OHIO EASTERN DIVISION-COLUMBUS

Michael Gaston, :

CASE NO. 2:17 cv 1151

Plaintiff, :

Judge James L. Graham

v. :

Norfolk Southern Railway Company, et al. :

Defendant.

NOTICE TO TAKE TELEPHONE DEPOSITION DUCES TECUM OF DANIEL WOLSTEIN, PHD, CRC, PVE, CLCP, CRV, IPEC, ABVE/F, LRC

PLEASE TAKE NOTICE that pursuant to the Federal Rules of Civil Procedure, Defendant Norfolk Southern Railway Company will depose, via telephone, Daniel Wolstein, PhD., CRC, PVE, CLCP, CRV, IPEC, ABVE/F, LRC as on cross-examination, on Friday, August 14, 2020 at 10:00 a.m. at Veritext – St. Louis, MO, 515 Olive Street, Suite 300, St. Louis, MO 63101. Counsel for Defendants has scheduled a court reporter.

The deponent is directed to bring with them for inspection and, upon request, copying a complete copy of his file pertaining to this matter.

The deposition shall continue from day to day until complete.

Respectfully submitted,

/s/ R. Leland Evans

R. Leland Evans (0006833)

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CERTIFICATE OF SERVICE

I hereby certify a copy of the foregoing *Notice to Take Deposition Duces Tecum of Daniel Wolstein, PhD., CRC, PVE, CLCP, CRV, IPEC, ABVE/F, LRC.* was served via the Court's electronic filing system on this 24th day of June, 2020 upon the following:

Stephen J. Schuh Schuh & Goldberg, LLP 2662 Madison Road Cincinnati, OH 45208 sschuh@schuhgoldberglaw.com Counsel for Plaintiff

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/s/R. Leland Evans

R. Leland Evans, Esquire ATTORNEY I.D. NO. 0006833

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